



discovery, and they are now in the final stages of such discovery. After much discussion and in consultation with the Special Master, the parties have agreed on a proposed schedule governing the remainder of fact discovery and the timing of expert discovery, as reflected in the proposed Case Management Order submitted with this Report and Recommendation. Under the proposed schedule, all fact discovery would conclude by March 28, 2014. Expert discovery would conclude by August 4, 2014.

The Special Master believes that the proposed schedule reflects a reasonable effort by the parties to conclude fact and expert discovery in an efficient and expeditious manner. The Special Master therefore recommends adoption of the Case Management Order submitted with this Report and Recommendation.

Dated: December 2, 2013

/s/ Bruce P. Merenstein

Bruce P. Merenstein, Special Master

